

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ALABAMA
WESTERN DIVISION**

JANE DOE #1, on behalf of herself and)
all others similarly situated,)

Plaintiffs,)

v.)

MG FREESITES, LTD, d/b/a)
“PORNHUB”; MG FREESITES II)
LTD; MINDGEEK S.A.R.L.;)
MINDGEEK USA INCORPORATED;)
MG CY HOLDINGS LTD;)
MINDGEEK CONTENT RT LIMITED;)
9219-1568 QUEBEC, INC., d/b/a)
MINDGEEK; MG BILLING LTD,)

Defendants.)

CIVIL ACTION NO:
7:21-cv-00220-LSC

Honorable L. Scott Coogler

PLAINTIFF’S NOTICE OF MOTION TO INTERVENE
IN CALIFORNIA ACTION

Plaintiff Jane Doe respectfully notifies this Court that she has filed a Motion to Intervene to Stay or Transfer Action Pursuant to the First-to-File Rule in the similarly situated California class action, *Mindgeek USA Inc*, 8:2021-cv-000338. See Exhibit 1.

Date: September 1, 2023

Respectfully submitted:

/s/ Gregory Zarzaur
Gregory Zarzaur (ASB-0759-E45Z)
Kelsie Overton (ASB-1791-F80L)
THE ZARZAUR LAW FIRM
2332 Second Avenue North
Birmingham, Alabama 35203
T: (205) 983-7985
E: gregory@zarzaur.com

Joshua P. Hayes
PRINCE GLOVER HAYES
701 Rice Mine Road
Tuscaloosa, Alabama 35406
T: (205) 345-1234
E: jhayes@princelaw.net

Kimberly Lambert Adams*
Kathryn Avila*
LEVIN PAPANTONIO RAFFERTY
316 S. Bavlen Street, Suite 600
Pensacola, FL 32502
T: (850) 435-7056
E: kadams@levinlaw.com
Kavila@levinlaw.com
**pro hac vice*

Brian Kent*
Gaetano D. Andrea*
Jill P. Roth*
M. Stewart Ryan*
Alexandria MacMaster*
LAFHEY, BUCCI & KENT, LLP
1100 Ludlow Street, Suite 300
Philadelphia, PA 19107
T: (215) 399-9255

E: bkent@lbk-law.com
gdandrea@lbk-law.com
jroth@lbk-law.com
sryan@lbk-law.com
amacmaster@lbk-law.com
**pro hac vice*

Benjamin W. Bull*
Dani Bianculli Pinter*
Christen M. Price*
Peter A. Gentala*
NATIONAL CENTER ON SEXUAL
EXPLOITATION
1201 F Street NW, Suite 200
Washington, D.C. 20004
T: (202) 393-7245
E: lawcenter@ncose.com
**pro hac vice*

Kevin Dooley Kent*
Mark B. Schoeller*
Vanessa L. Huber*
CLARK HILL PLC
Two Commerce Square
2001 Market Street
Suite 2620
Philadelphia, PA 19103
T: (215) 640-8500
E: kkent@clarkhill.com
mschoeller@clarkhill.com
vhuber@clarkhill.com
**pro hac vice*

Counsel for Plaintiffs

CERTIFICATE OF SERVICE

I hereby certify on this 1st day of September 2023, this document was served on all counsel of record.

Sarah M. Turner
BAKER, DONELSON, BEARMAN,
CALDWELL & BERKOWITZ, PC
1906 Sixth Avenue North
Suite 2600
Birmingham, Alabama 35203
E: smturner@bakerdonelson.com

Kathleen M. Massey (*pro hac vice*)
Hayden Coleman (*pro hac vice*)
DECHERT LLP
Three Bryant Park
1095 Avenue of the Americas
New York, New York 10036
E:kathleen.massey@dechert.com

Attorneys for Defendants

/s/ Gregory Zarzaur
Gregory Zarzaur